

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

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JANE DOE,

Plaintiff,

Case No. 23-cv-4837

v.

STEPHAN SHAW AND CITY OF  
CHICAGO,

*Jury Trial Demanded.*

Defendants.

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**PLAINTIFF'S MOTION FOR LEAVE TO PROCEED ANONYMOUSLY**

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NOW COMES Plaintiff Jane Doe, by and through her attorney, and hereby moves this Court for an order allowing her to proceed in this lawsuit under a pseudonym. In support of this motion, Plaintiff states:

1. Plaintiff Jane Doe brings the instant lawsuit against current Chicago police officer Stephan Shaw for violating her constitutional rights by, inter alia, subjecting her to unreasonable searches and seizure of her genitalia. *See Dkt. 1.*
2. The presumption that a plaintiff's identity is public information can be rebutted by showing that the harm to the party requesting anonymity exceeds the likely harm to the defendant and to the public from concealment. *See Doe v. City of Chicago*, 360 F.3d 667, 669 (7th Cir. 2004). Courts usually find that the presumption has been rebutted when the plaintiff is a child, a victim of a sexual assault, or a likely target of retaliation by people who would learn his or her identity only from a judicial opinion or other court filing. *Id.*

3. Here, Plaintiff alleges that she was subjected to unreasonable searches and seizure of her genitalia, which constitutes sexual abuse under state law. *See* 720 ILCS 5/11-1.50. Plaintiff fears that if her full name is revealed in the public record, she will suffer the unfortunate humiliation and social stigma that is often associated with being a victim of sexual abuse.

4. Defendant, on the other hand, will suffer no harm if this Court grants Plaintiff's motion to proceed anonymously. Plaintiff have no objection to providing her full name to Defendant; she simply wants this information out of the public record. Therefore, Defendant's ability to defend the lawsuit will not be impaired in any way if Plaintiff is permitted to proceed anonymously. While the free flow of information to the public should be guarded, in the present case, the harm to Plaintiff by revealing her identity in the public record favors concealment.

5. In another case involving allegations of illegal body cavity and strip searches against Milwaukee police officers, the Court granted the plaintiffs' motion to proceed using pseudonyms. *See Ashford v. City of Milwaukee*, 2014 U.S. Dist. LEXIS 1590 (E.D. Wis. Jan. 2, 2014).

For the foregoing reasons, Plaintiff Jane Doe respectfully requests that this Court grant her leave to proceed with this lawsuit under a pseudonym to identify her in the public record.

**Dated:** August 30, 2023

Respectfully submitted,  
JANE DOE

By: /s/ Jordan Marsh  
*Attorney for the Plaintiff*

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**CERTIFICATE OF SERVICE**

I certify that on August 30, 2023, I served a copy of the foregoing MOTION FOR LEAVE TO PROCEED ANONYMOUSLY on all counsel of record by filing the same on the Court's ECF system.

/s/ Jordan Marsh